A.T. Kearney, Inc.
One Lagoon Drive
Redwood City, California 94065
415 595 4300

June 2, 1989

Management Consultants

ENVIRONMENTAL PROTECTION AGENCY REGION II

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MAZARDOUS WASTE PROGRAMS BRANCH Please Ranno + Affron AKAR

4TKEARNEY

Mr. Ben Singh
Hazardous Waste Programs Branch
Air and Waste Management Division
U.S. EPA Region II (2AWM-HWP)

26 Federal Plaza New York, NY 10278

PRD 980 594 709

Reference:

EPA Contract No. 68-W9-0040; Work Assignment

No. R02-01-05; Browning Ferris Industries;

Ponce, Puerto Rico EPA I.D. No. VID

980536080; Work Plan

Dear Mr. Singh:

Enclosed please find the proposed work plan which you requested for the above-referenced work assignment. This work plan calls for the Kearney Team to review the closure plan, review a post-closure plan, and prepare a draft permit.

All applicable A.T. Kearney conflict of interest avoidance procedures have been adhered to for the proposed firms and staffs

Also enclosed is a work plan approval sheet which you should sign and return to Allen Pearce. In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan by July 2, 1989, A.T. Kearney will stop work on this project. In these cases, A.T. Kearney will not resume work until the Contracting Officer approves the work plan.

Please feel free to call me or Carl Jeffreys, the Work Assignment Manager (who can be reached at 412/269-6000) if you have any questions.

Sincerely,

Monica B. Roll

Technical Director

Ann B. Kall

cc: A. Pearce, EPA OSW

S. Kovash, EPA Contracts

D. Pocze, EPA Region II

A. Glazer

D. Bean

J. Atlas

L. Sherman

M. Ritter

T. Bingman, B/TSA

R. Breeden, BA

0326p

PROPOSED WORK PLAN

BROWNING FERRIS INDUSTRIES

Submitted by:

A.T. Kearney, Inc. One Lagoon Drive, Suite 220 Redwood City, CA 94065

Submitted to:

Mr. Ben Singh
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

In response to:

EPA Contract No. 68-W9-0040 Work Assignment No. R02-01-05

June 2, 1989

Work Plan Amendment No. 0 June 2, 1989

Regional Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s), as described in the work assignment. The projected cost, staff hour estimates, and labor mix are also acceptable.

APPROVAL:	
EPA Regional Project Officer	Date
APPROVAL:	
EPA Headquarters Project Officer	Date
APPROVAL:	
EPA Contracting Officer	Date
CONCURRENCE:	
A.T. Kearney Program Director	Date

Work Plan Amendment No. 0 June 2, 1989

BROWNING FERRIS INDUSTRIES

WORK TO BE PERFORMED

The Kearney Team will review the closure plan, the post-closure plan, and provide a draft post-closure permit for BFI. This will be conducted in accordance with applicable parts of 40 CFR 264 and 270.

PRIMARY INTENDED USE

The checklist and comments, will provide the Technical Monitor, Mr. Douglas Pocze, with a measure of adequacy of the closure and post-closure applications and the compliance of the facility with the above-mentioned regulations and guidance. The draft permit and final permit will be used to solicit public comment and issue a post-closure permit to the applicant.

PROJECTS AND TASKS

The project will consist of the following tasks:

- Task 01 Prepare a work plan. This will include all preliminary contacts required for the preparation of the plan.
- Task 02 Review the closure plan and provide a letter identifying deficiencies and/or conditional approval of the plan. A checklist will be included to identify areas covered during the review.
- Task 03 Review the post-closure permit application. Prepare a technical checklist and Notice of Deficiency comments.
- Task 04 Review the Response to the Notice of Deficiency, and prepare a draft post-closure permit for Landfarm I structured according to the <u>EPA Model RCRA Permit for Hazardous Waste Management Facilities</u> September, 1988. The deliverable must conain all references, attachments, compliance schedules, maps or diagrams which must be developed. This task includes necessary trips to the Region and/or site.
- Task 05 Prepare a final permit which incorporates any changes or comments provided by the Agency regarding the Draft Post-Closure Permit. Additionally a Responsiveness Summary answering all questions and comments submitted during the comment period.
- $\underline{\text{Task 98}}$ Perform a quality control review of the draft deliverables.
 - Task 99 Provide management oversight for the project.

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HEALTH AND SAFETY PLAN

In preparing for the site visit, the Kearney Team will complete a site-specific checklist to identify the activities and potential hazards at the site. Information to complete the checklist will be obtained from the Regional Project Officer and/or other EPA staff who are knowledgeable about the site and from the facility contact.

After the checklist has been completed, a determination will be made regarding the need for a health and safety plan for the site visit based on the anticipated hazards at the site. In cases where a health and safety plan is required, the Kearney Team will develop a specific plan for the site and amend the work plan to include an additional task to provide for resources for plan development. In cases where no health and safety plan is required (i.e., minimal hazard potential), the Kearney Team will follow health and safety procedures as outlined in the Kearney Staff Protocol for site visits.

MONTHLY PROGRESS REPORTS

Information regarding the status of this project will be included in the monthly progress reports A.T. Kearney, Inc. provides to EPA. The information will address:

- Work completed to date,
- Difficulties encountered and remedial action taken,
- Anticipated activity during the subsequent reporting period, and
- Sufficiency of dollars and hours to complete the project.

QUALITY CONTROL PLAN

The Work Assignment Manager will conduct milestone checks on each task. In addition, draft project deliverables will be reviewed by senior technical staff members of A.T. Kearney to ensure quality and consistency with EPA regulations and policy.

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STAFFING AND MANAGEMENT

Mr. Carl Jeffreys of Baker/TSA, Inc. will serve as the Work Assignment Manager (WAM).

The proposed staffing and task assignments for the project are shown on the following page. Hour allocations are shown for each task. Individual staff responsibilities are shown in Attachment I. All applicable Conflict of Interest Avoidance (COI) procedures have been adhered to for the proposed firms and staffs.

COST ESTIMATE

The estimated cost for completing this project is included as Attachment IV.

BASIS FOR PERFORMANCE EVALUATION

The measures for evaluation of work assignment performance are described for each of the following performance criteria: technical quality; compliance with schedule; compliance with budget; and management. Measures for each of these criteria are discussed and agreed upon by the RPO and the Kearney Team WAM during the assignment planning process. To the extent possible, clear, quantitative measures should be established.

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ATTACHMENT I

STAFF RESPONSIBILITY CHART

STAFF	ROLE	AREAS OF RESPONSIBILITY
C. Jeffreys	Work Assignment Manager; reviewer	Landfill
L. Potts	Reviewer	General sections
D. Black	Reviewer	Groundwater
T. Bingman	Oversight	Entire project
R. Breeden	QC Reviewer	Entire project
A. Dale	QC Reviewer	Financial Assurance

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ATTACHMENT II

STAFFING

STAFF					-		TASK			
Name	Firm	1/ Labor Category	<u>01</u>	<u>02</u>	<u>03</u>	<u>04</u>	<u>05</u>	<u>98</u>	3/ ₉₉	4/ TOTAL
Technical <u>Director</u>										
M. Roll	ATK	P-3	4	_	-	_	_	_	12	16
Work Assignment Manager										
C. Jeffreys	B/TSA	P-3	5	-	-	-	-	_	24	29
Staffing										
C. Jeffreys	B/TSA	P-3	_	48	60	60	16	_	_	184
L. Potts	B/TSA	P-2	_	_	40	40	24		_	
D. Black	B/TSA	P-2	_	_	80	60	16	_	-	104
T. Bingman	B/TSA	P-4	5	_	16	16	8	-	-	156
Tech. Support	B/TSA	T-2	_	8	20	24	-	-	-	45
L. Sherman	ATK	T-1	8	-	20	24	16	-	-	68
J. Atlas	ATK	P-4	6	-	_	-	-	-	8	16
Tech. Support	ATK		8	-	-	-	_	-	6	12
			0	-	-	-	-	-	4	12
Quality Control										
A. Dale	ATK	P-3	_					••		
R. Breeden	BA	P-4	_	_	-	-	-	20	-	20
						-	_	<u>52</u>	_	_52
Totals			36	56	216	200	80	72	54	714

^{1/} ATK = A.T. Kearney, Inc.
B/TSA = Baker/TSA, Inc.
BA = Breeden Associates

^{2/} Provides Labor Classification for Each Staff Person
 (e.g., P4, P3)

³/ Task 98 = Quality Control

⁴ Task 99 = Project Management

ATTACHMENT III

SCHEDULE

<u>Task</u>	Milestone #	Description	Scheduled Date
01	01	Prepare project plan	06/02/89
02	02	Closure plan review to QC	06/19/89
02	03	QC comments to original reviewer	06/21/89
02	04	Closure plan review to Technical Director	06/22/89
02	05	Closure plan review to EPA	06/23/89
03	06	Post-closure review to QC	TBD**
03	07	QC comments to original reviewer	TBD
03	08	Post closure review to Technical Director	
03	09	Post closure review to EPA	TBD
04	10	Draft permit to QC	TBD
04	11	QC comments to original reviewer	TBD
04	12	Draft permit to Technical Director	TBD
04	13	Draft permit to EPA	TBD
05	14	Final permit submitted to QC	TBD
05	15	QC comments submitted to initial reviewer	TBD
05	16	Final permit due to EPA	TBD
99	17	Project Manager	In accordance with above milestones

^{**} To Be Determined

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ATTACHMENT IV

ESTIMATED COSTS

A.T. Kearney, Inc.		<u>Hours</u>	Cost
Labor Other Direct Costs		76	\$4,045 2,985
Subtotal			\$7,030
Baker/TSA, Inc.			
Labor Other Direct Costs Travel Subtotal		586	\$25,328 2,000 4,000 \$31,328
Breeden Associates			
Labor Other Direct Costs		52	\$3,032
A.T. Kearney, Inc.	SUBTOTAL		\$41,502
Fee - 3% Base - 3% Award			\$1,245 <u>1,245</u> \$2,490
TOTAL ESTIMATED COST		714	\$43,992
AVERAGE TOTAL LABOR COST PER HOUR FOR ALL FIRMS	\$45.38		